

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**Secure Ink LLC,**

Plaintiff,

v.

**M-Files, Inc.,**

Defendant.

**Case No. 6:24-cv-00077-KC**

**Jury Trial Demanded**

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO MOVE, ANSWER, OR OTHERWISE RESPOND**

Plaintiff Secure Ink LLC (“Plaintiff”) files this Unopposed Motion for Extension of Time for Defendant M-Files, Inc. (“Defendant”) to answer, move or otherwise respond to the Complaint.

Defendant’s response to the Complaint is currently due on April 1, 2024. Good cause exists to extend the deadline. Defendant continues investigating Plaintiff’s Complaint, the claim embodied therein, and their factual contentions. Counsel for Plaintiff has conferred with counsel for Defendant, and this request is unopposed. Accordingly, Defendant’s new deadline will be May 1, 2024, under the unopposed 30-day extension.

The extension sought by this motion is the second extension of this deadline. The parties do not make this request for the purpose of delay, but so that justice may be efficiently served.

Accordingly, Plaintiff requests that the Court grant this Unopposed Motion and extend the time for Defendant to answer, move, or otherwise respond to Plaintiff’s Complaint to May 1, 2024.

Dated: March 28, 2024

Respectfully submitted,

s/ Isaac Rabicoff  
Isaac Rabicoff

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**Counsel for Plaintiff**  
**Secure Ink LLC**

**CERTIFICATE OF CONFERENCE**

In compliance with Local Rule CV-7(i), counsel for Plaintiff and counsel for Defendant conferred regarding the motion for extension of time on March 28, 2024. Counsel for Defendant does not oppose this motion and the extension sought hereby.

/s/ Isaac Rabicoff  
Isaac Rabicoff

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on March 28, 2024, via the Court's CM/ECF system.

/s/ Isaac Rabicoff  
Isaac Rabicoff